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**From:** Davis, Donna [Davis.Donna@epa.gov]  
**Sent:** 3/25/2019 12:30:53 PM  
**To:** Goodis, Michael [Goodis.Michael@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]  
**Subject:** FW: LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations

I think we tried not to involve you since you both were out of the office...but some of last week was a blur, so just in case, here is the latest that went up in response to a reporter inquiry.

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**From:** Keigwin, Richard  
**Sent:** Friday, March 22, 2019 6:11 AM  
**To:** Chiu, Enid <Chiu.Enid@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>  
**Cc:** Perlis, Robert <Perlis.Robert@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>  
**Subject:** RE: LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations

See comments below in **bold red**

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**From:** Chiu, Enid  
**Sent:** Thursday, March 21, 2019 4:28 PM  
**To:** Sisco, Debby <Sisco.Debby@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>  
**Cc:** Perlis, Robert <Perlis.Robert@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>  
**Subject:** RE: LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations

FYI – Bob Perlis just messaged me and approved of the draft below.

–

**Enid Chiu**  
Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 347-8262 | [chiu.enid@epa.gov](mailto:chiu.enid@epa.gov)  
<https://www.epa.gov/pesticides>

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**From:** Sisco, Debby  
**Sent:** Thursday, March 21, 2019 4:27 PM  
**To:** Keigwin, Richard <Keigwin.Richard@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>  
**Cc:** Perlis, Robert <Perlis.Robert@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Chiu, Enid <Chiu.Enid@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>  
**Subject:** FW: LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations  
**Importance:** High

I tried to call Bob, but have to leave shortly and am off tomorrow.

I don't have a problem with sticking close to what we already have approved on this issue, but I don't think #4 is responsive at all. Have we ever discussed the problem or even anything closely related to 24(c) with SFIREG? Or AAPCO?

1. What led to the EPA re-evaluating this registration?

## Ex. 5 Deliberative Process (DP)

2. Why would requests that "narrow the federal label, such as to add a more restrictive cut-off date, to add training and certification requirements, or to restrict the use directions by limiting the number of treatments permitted by the federal label," fall outside the appropriate use of Special Local Needs (SLN) registrations?

## Ex. 5 Deliberative Process (DP)

3. If a state cannot narrow the federal label, what can SLNs be used for?

## Ex. 5 Deliberative Process (DP)

4. Was any outside organization consulted in this decision? Academic experts, industry groups, associations, registrants, other government agencies?

## Ex. 5 Deliberative Process (DP)

5. Did a specific incident or request spur the agency to re-evaluate these requests?

Ex. 5 Deliberative Process (DP)

6. Is there any where I can review the 24(c) requests that are made to the EPA every year?

Ex. 5 Deliberative Process (DP)

*Debby Sisco*

Ethics Officer and Special Assistant to the Director  
Office of Pesticide Programs (7501P)  
US Environmental Protection Agency  
4<sup>th</sup> floor - 4241 Potomac Yard South  
(office: 703 308-8121; Mobile: 571 317-4823)

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**From:** Han, Kaythi  
**Sent:** Thursday, March 21, 2019 3:51 PM  
**To:** Sisco, Debby <[Sisco.Debby@epa.gov](mailto:Sisco.Debby@epa.gov)>  
**Cc:** Chiu, Enid <[Chiu.Enid@epa.gov](mailto:Chiu.Enid@epa.gov)>; Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>; Naimy, Nina <[Naimy.Nina@epa.gov](mailto:Naimy.Nina@epa.gov)>  
**Subject:** FW: LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations  
**Importance:** High

Hi Debby,

As discussed on the phone, here are the responses to one press inquiry on the 24(c) registrations. While Bob Perlis looked at the original responses, he has not commented on the redrafted responses requested by Donna Davis.

If you have any questions, ask away! I'll forward you the other 24(c) press inquiry next.

Kaythi Han  
Team Leader, Communications  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-5642 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

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**From:** Chiu, Enid  
**Sent:** Thursday, March 21, 2019 2:38 PM  
**To:** Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>  
**Subject:** RE: LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations  
**Importance:** High

Greg and Kaythi:

The other 24(c) press inquiry response for your review, with the same caveat of needing to hear from OGC one more time. Also hoping to get this to OCSPP by COB today. Thank you!

—

**Enid Chiu**  
Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 347-8262 | [chiu.enid@epa.gov](mailto:chiu.enid@epa.gov)  
<https://www.epa.gov/pesticides>

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**From:** Davis, Donna  
**Sent:** Thursday, March 21, 2019 2:16 PM  
**To:** Chiu, Enid <[Chiu.Enid@epa.gov](mailto:Chiu.Enid@epa.gov)>  
**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Davis, Kable

<Davis.Kable@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>

**Subject:** RE: LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations

Enid,

**Ex. 5 Deliberative Process (DP)**

To that end, I would propose the following responses be provided to Rick. Please feel free to run this by Bob to be sure he is comfortable with the answers, but I think this approach is more consistent where I think the Agency is on this issue right now.  
Donna

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5. Did a specific incident or request spur the agency to re-evaluate these requests?

## Ex. 5 Deliberative Process (DP)

6. Is there any where I can review the 24(c) requests that are made to the EPA every year?

## Ex. 5 Deliberative Process (DP)

**From:** Chiu, Enid

**Sent:** Thursday, March 21, 2019 11:32 AM

**To:** Davis, Donna <[Davis.Donna@epa.gov](mailto:Davis.Donna@epa.gov)>

**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Davis, Kable <[Davis.Kable@epa.gov](mailto:Davis.Kable@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>

**Subject:** RE: LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations

**Importance:** High

Hi Donna,

Please review this press inquiry response on 24(c) by 3pm today. OGC has reviewed and suggests we need Rick's direction on #5. Thanks!

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## Ex. 5 Deliberative Process (DP)

2. Why would requests that "narrow the federal label, such as to add a more restrictive cut-off date, to add training and certification requirements, or to restrict the use directions by limiting the number of treatments permitted by the federal label," fall outside the appropriate use of Special Local Needs (SLN) registrations?

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**Enid Chiu**

Communication Services Branch  
Office of Pesticide Programs  
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(703) 347-8262 | [chiu.enid@epa.gov](mailto:chiu.enid@epa.gov)  
<https://www.epa.gov/pesticides>

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**From:** Daguiard, Robert

**Sent:** Wednesday, March 20, 2019 12:50 PM

**To:** Strauss, Linda <[Strauss.Linda@epa.gov](mailto:Strauss.Linda@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>; Sisco, Debby <[Sisco.Debby@epa.gov](mailto:Sisco.Debby@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Dinkins, Darlene <[Dinkins.Darlene@epa.gov](mailto:Dinkins.Darlene@epa.gov)>

**Subject:** LINDA/OPP: INVESTIGATE MIDWEST - Guidance on FIFRA 24(c) Registrations

**MW CENTER FOR INVEST. REPORTING**

**CHRIS WALLJASPER**

**DDL FRIDAY 3/22**

Colleagues, another one. Thanks in advance, R.

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Hello,

I'm working on a story about the newly announced re-evaluation by the EPA of FIFRA 24(c) SLN registrations:

<https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations>

Could someone from the EPA who's been involved in this decision be made available for an interview this week? I have a deadline of Friday, noon CST.

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3. If a state cannot narrow the federal label, what can SLNs be used for?
4. Was any outside organization consulted in this decision? Academic experts, industry groups, associations, registrants, other government agencies?
5. Did a specific incident or request spur the agency to re-evaluate these requests?
6. Is there any where I can review the 24(c) requests that are made to the EPA every year?

Let me know. I'd still rather speak to someone, if that is possible, but I understand the time limitations.

Let me know.

Thanks,

CW

Christopher Walljasper  
*Investigative Reporter*

[Chris.Walljasper@investigatemitwest.org](mailto:Chris.Walljasper@investigatemitwest.org)  
[www.investigatemitwest.org](http://www.investigatemitwest.org)  
319.371.4887

